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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

COMMUNITY SCHOOL INITIATIVE,

Plaintiff,

VS.

VANGUARD FIELD STRATEGIES, LLC,
JEFF ROE, AXIOM LLC, GARRISON
MANAGEMENT GROUP, LLC, DOES 1
Through 100, and ROE 1 through 100

Defendant.

Case No.: 23-CV-00069-APG-EJY

**STIPULATION AND ORDER TO
EXTEND DATE TO FILE REPLY TO
PLAINTIFF'S RESPONSE [ECF No.
32] TO DEFENDANT'S MOTION TO
DISMISS [ECF No. 28]
(First Request)**

Defendants Vanguard Field Strategies, LLC (“Vanguard”) and Axiom LLC (“Axiom”) and Plaintiff Community School Initiative submit this Stipulation and Order to Extend Date to File Reply to Plaintiff’s Response [ECF No. 32] to Defendant’s Motion to Dismiss [ECF No. 28].

This Stipulation seeks to extend the deadline to file a Reply for 5 calendar days until and including July 12, 2023. This is the first stipulation for an extension to file a Reply, and it makes reference to the following:

1. Defendants Vanguard and Axiom timely filed a Motion to Dismiss [ECF No. 28].
2. Plaintiff timely filed a response to the Motion [ECF No. 32].

1 3. Defendants' Reply is currently due on July 7, 2023.
2 4. While Defendants have attempted to diligently file a timely Reply, the Independence Day
3 Holiday has cut short Defendants' business days in which to complete its papers.
4 5. Defendants seek a short, 5-day extension, up to and including July 12, 2023, to file their
5 Reply, and Plaintiff agrees with this short extension.
6 6. This Stipulation is being proffered in good faith and not for purposes of delay.

7 Dated this 7th day of July 2023.

8 TAKOS LAW GROUP, LTD.

9 By: /s/ Zachary P. Takos

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16 *Attorneys for Plaintiff*

7 Dated this 7th day of July 2023.

8 ARMSTRONG TEASDALE LLP

9 By: /s/ Jeffrey F. Barr

10 JEFFREY F. BARR, ESQ.
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14 *Attorneys for Defendants*

15 **IT IS SO ORDERED.**

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18 UNITED STATES MAGISTRATE JUDGE

19 Dated: July 10, 2023

20 Submitted by

21 ARMSTRONG TEASDALE LLP

22 By: /s/ Jeffrey F. Barr

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